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May 18, 2017

VIA ECF

The Honorable Edgardo Ramos
United States District Court, Southern of New York
40 Foley Square
New York, NY 10007

Re: John Macias v. Barrier Free Living, Inc. (Civil Action No. 16-cv-01735-ER)

Dear Judge Ramos:

We represent defendant Barrier Free Living, Inc. in the above-referenced matter. We write to respectfully request a one-week extension of time to file a summary judgment motion on behalf of BFL due to unforeseen professional obligations and a previously scheduled personal commitment. Plaintiff's counsel has consented to this request.

At a pre-motion conference on April 25, 2017, the Court set a briefing schedule for BFL's anticipated summary judgment motion. Specifically, the Court set the due date for BFL's moving papers as May 25, 2017, for Plaintiff's opposition as July 25, 2017, and for BFL's reply as August 8, 2017. With a one-week extension, BFL's brief would be due on or before June 1, 2017. This is the first request for an extension of this deadline, and an extension would not affect any other deadlines in this case.

Thank you for your attention to this matter.

Respectfully submitted,

DLA Piper LLP (US)

A handwritten signature in cursive script that reads 'Jodi M. Frankel'.

Jodi M. Frankel

cc: Abraham Z. Melamed, Esq., Attorney for Plaintiff (via ECF)